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Attorney for Plaintiffs

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UNITED STATES DISTRICT COURT

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DISTRICT OF NEVADA

CASE NO.: 3:17-cv-00576-MMD-WGC

Plaintiffs,

URSZULA BRUMER, an Individual, and MALGORZATA KASPRZAK-GUZEK, an

VS.

LAURIE GRAY, an Individual,

Defendant.

JOINT STIPULATION TO EXTEND TIME TO FILE JOINT PRETRIAL ORDER

(Second Request)

IT IS HEREBY STIPULATED AND AGREED, by and between Plaintiffs URSZULA BRUMER and MALGORZATA KASPRZAK-GUZEK, and Defendant LAURIE GRAY, that the deadline for the parties to file the Joint Pretrial Order be extended until October 31, 2019.

Pursuant to the latest scheduling order dated September 6, 2018 (ECF No. 30), the parties had to file the Joint Pretrial Order 30 days "after the court enters a ruling on the dispositive motions, or otherwise by further order of the Court." *Id. at 4*.

On April 8, 2019, the Defendant filed her Motion to Preclude Untimely Disclosed Damages, and Motion for Partial Summary Judgment for Lack of Damages (ECF. 40). This Motion was ruled upon on June 26, 2019 (ECF No. 55), which triggered the parties' deadline to

file the Joint Pretrial Order on July 22, 2019. Through inadvertence, however, which was partly caused by the Plaintiff's filing of the Motion in Limine to Exclude Expert Testimony of James S. Forage, M.D. that is currently pending before the court (ECF No. 56), as well as the change of the attorneys handling the Defendant's case, the parties did not file the Joint Pretrial Order to this day.

Due to the voluminous documents produced in this case, the parties needed additional time to prepare such an order. The parties previously submitted a stipulation extending the time for the parties to file the order until October 21, 2019. While the parties have met and conferred on two (2) separate occasions regarding the content of the order as well as have exchanged a draft of the order, due to the voluminous nature of the evidence at issue, additional time is needed for the parties to consider certain evidence and whether stipulations can be reached.

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1	For these reasons, the parties respectfully request that the time to file the Joint Pretrial	
2	Order be extended until October 31, 2019.	
3	Dated this 21st day of October 2019.	Dated this 21st day of October 2019.
4	/s/ Jakub P. Medrala	/s/ Christina Mundy-Mamer
5	Jakub P. Medrala, Esq. 1091 S. Cimarron Road, Suite A-1	M. Caleb Meyer, Esq. Nevada Bar No. 13379
6	Las Vegas, Nevada 89145 Attorney for Plaintiffs	Renee M. Finch, Esq. Nevada Bar No. 13118
7	1100 ney yer 1 tallingys	Christina Mundy-Mamer, Esq. Nevada Bar No. 13181
8		8945 West Russell Road, Suite 300 Las Vegas, Nevada 89148
9		Attorneys for Defendant
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12	ORDER	
13	Based on the parties' stipulation, and good cause appearing, IT IS HEREBY ORDERED	
14	that the time for the parties to file the Joint Pretrial Order be extended to October 31, 2019.	
15	IT IS SO ORDERED.	
16	DATED: October 22, 2019	
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18		UNITED STATES DISTRICT JUDGE
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